

Exhibit D

Wang Zhaojie Highly Confidential
March 07, 2019

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1
IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 San Francisco Division4
IN RE:)
5 CATHODE RAY TUBE (CRT)) Master File No.
ANTITRUST LITIGATION) 07-CV-5944-JST
6) MDL No. 1917
7)
8)
- - - - -

9 DEPOSITION OF WANG ZHAOJIE

10 HIGHLY CONFIDENTIAL

11 VOLUME II

12 Thursday, March 7th, 2019

13 AT: 9.02 am

14 Taken at:

15 Kobre & Kim
16 6/F ICBC Tower
17 3 Garden Road
Central
Hong Kong

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21

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23 Court Reporter:

24 Bron Williams
Accredited Real-time Reporter

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March 07, 2019

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1 A P P E A R A N C E S

2 Appearng for the Direct Plaintiffs:

3 STEVEN BENZ
4 BENJAMIN MARGO
5 KELLOGG, HANSEN, TODD, FIGEL & FREDERICK
Sumner Square
1615 M Street, NW, Suite 400
Washington, DC 20046
Telephone: 202.326.79297 DAVID HWU
8 SAVERI & SAVERI
9 706 Sansome Street
San Francisco, CA 94111
Telephone: 415.217.6810

10 Appearng for the Indirect Plaintiffs:

11 MS QIANWEI FU
12 ZELLE LLP
13 44 Montgomery Street
14 Suite 3400
15 San Francisco CA 94104
16 Telephone: 415.633.190617 MS LAUREN CAPURRO
18 TRUMP, ALIOTO, TRUMP AND PRESCOTT
2280 Union Street
19 San Francisco
CA 94123
Telephone: 415.563.7200

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2 Appearing for the Defendant:

3
4 STUART PLUNKETT
5 BRIAN JACOBSSMEYER
6 KAYLEE YANG
7 YAN ZHANG
8 BAKER BOTTS LLP
9 101 California Street
10 Suite 3600
11 San Francisco, CA 94111
12 Telephone: 415.291.6203

13
14 Also present: Inga Kornev

15 Videographer

16 Ms Shing Tang (Irico rep)

17 Ms Guo Xiao Yan (Irico rep)

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1 VIDEOGRAPHER: Good morning. Here begins
2 volume II, media number 1 in the deposition of Wang Zhaojie,
3 in the matter of In Re Cathode Ray Tube (CRT) Antitrust
4 Litigation in the United States District Court, Northern
5 District of California, San Francisco Division, Master File
6 Number 07-CV-5944-JST MDL number 1917.

7 Today's date is March 7, 2019. The time on the
8 video monitor is 9.02 a.m. The certified video operator
9 today is Inga Kornev contracted by US Legal Support. This
10 video deposition is taking place at Kobre & Kim, ICBC Tower,
11 3 Garden Road, Central, Hong Kong. Counsel please voice
12 identify yourselves and state whom you represent.

13 MR. BENZ: Steven Benz from the law firm of
14 Kellogg, Hansen PLLC in Washington DC for the direct
15 purchaser plaintiffs.

16 MR. MARGO: Benjamin Margo from the Kellogg,
17 Hansen law firm for the direct purchaser plaintiffs.

18 MS. FU: Qianwei Fu from Zelle LLP in San
19 Francisco for the indirect purchaser plaintiffs.

20 MS. CAPURRO: Lauren Capurro, Trump, Alioto, Trump
21 & Prescott for the indirect purchaser plaintiffs.

22 MR. HWU: David Hwu from Saveri & Saveri in San
23 Francisco on behalf of the direct purchaser plaintiffs.

24 MR. PLUNKETT: Stuart Plunkett of Baker Botts on
25 behalf of the Irico defendants and the witness.

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1 MS. YANG: Kaylee Yang from Baker Botts LLP on
2 behalf of the defendant, Irico defendant.

3 MR. JACOBSEYER: Brian Jacobsmeyer from Baker
4 Botts LLP on behalf of the Irico defendants and the witness.

5 MS. SHANG: Shang Ting.

6 MS. GUO: Xiaoyan Guo.

7 INTERPRETER: Kuang-Shai Chao. I am the
8 interpreter.

9 VIDEOGRAPHER: The court reporter today is Bron
10 Williams, on behalf of US Legal Support.

11 Would the reporter please swear in the
12 interpreters and the witness.

13 INTERPRETER - Mr Kuang-Shai Chao (sworn)
14 MS QIANWEI FU - (affirmed) - acting as check interpreter

15 WANG ZHAOJIE

16 having been duly affirmed testified as follows:

17 (All answers were given through the interpreter unless
18 otherwise indicated)

19 BY MR. BENZ:

20 Q. Good morning, Mr. Wang.

21 A. Good morning.

22 Q. If you could pick up Exhibit 8390, the
23 30(b) (6) deposition notice.

24 (Previously marked exhibit 8390 shown to the witness)

25 A. Yes.

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1 A. About a couple of weeks ago.

2 Q. Did you speak with Mr. Guo to prepare for your
3 testimony here today? At any time?

4 MR. PLUNKETT: Object to the form.

5 BY MR. BENZ:

6 Q. Mr. Wang, there is a question pending, unless
7 your counsel --

8 A. First of all, I worked for this company for
9 many, many years, and in the sales department, where Mr. Guo
10 was my supervisor. I also reviewed his declaration.

11 BY MR. BENZ:

12 Q. You did not answer my question, Mr. Wang. My
13 question was: Did you speak with Mr. Guo to prepare for
14 your deposition here today?

15 MR. PLUNKETT: Object to the form.

16 A. Would you please repeat your question?

17 BY MR. BENZ:

18 Q. Did you speak with Mr. Guo to prepare for your
19 deposition?

20 MR. PLUNKETT: Object to the form.

21 MR. BENZ: What is the basis for your objection?
22 It is a simple fact.

23 MR. PLUNKETT: No. The basis for the objection is
24 the confusion you have confusion in asking him whether he
25 spoke to Mr. Guo -- you know, a few days to prepare for

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1 MR. PLUNKETT: Object to the form.

2 A. I'm not very clear about your questions. As
3 I said, Mr. Guo was my supervisor long time ago. We have
4 regular contact and communication. In the past.

5 BY MR. BENZ:

6 Q. In the past month have you spoken with
7 Mr. Guo?

8 A. Please be more specific.

9 Q. In the past 30 days have you spoken with
10 Mr. Guo?

11 A. Please be specific about the date.

12 MR. PLUNKETT: So I would like to advise the
13 witness that to the extent he is able to understand that
14 counsel is asking him if in the past 30 days he has ever
15 spoken to Mr. Guo for any reason, he should provide that
16 information to counsel.

17 A. I don't remember exactly.

18 MS. FU: I would like to correct that translation.
19 It should be "I don't recall." (Chinese spoken). It is not
20 (Chinese spoken). (Chinese spoken).

21 A. (Chinese spoken).

22 INTERPRETER: The witness said "I don't agree."

23 To clarify, I agree with the check interpreter's
24 comment.

INTERPRETER: (Chinese spoken) .

A. I have reviewed 50 documents. And the relevant informations.

(Exhibit 8414 marked for identification)

Q. Mr. Wang, I've handed you what has been marked as Exhibit 8414.

A. Okay.

Q. I will represent to you that it is from a Chinese government website. The exhibit has the official English version on top, and the official Chinese version underneath.

Please take a moment to familiarize yourself with this document.

A. Okay. It will take a while.

BY MR. BENZ:

Q. Mr. Guo(sic), it has been 13 minutes. You can have as much time as you want to review the document, but I only have a few questions about the document.

Sorry: Mr. Wang.

A. Just take a while, I'm about to finish it.

Q. That's fine. Thank you.

A. Okay, I'm done.

Q. Mr. Wang, do you know what this document is?

A. This is a company law of the People's Republic

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1 During that time were you a member of the Chinese Communist
2 Party?

3 A. Yes.

4 Q. When you were at Group, your supervisor was
5 Mr. Guo, correct?

6 Was Mr. Guo a member of the Chinese Communist
7 Party?

8 MR. JACOBSMEYER: Object to the form.

9 A. Your question is not very precise, because the
10 fact is that I worked for Irico for many, many years, so
11 there is Mr. Guo who worked for many, many years. There are
12 quite a lot of change in between. So I'm not quite when you
13 refer to supervisor, I'm not quite sure regarding that
14 point.

15 BY MR. BENZ:

16 Q. I'm talking about Mr. Guo who authored the
17 declaration that you reviewed.

18 Was Mr. Guo a member of the Chinese Communist
19 Party when he was your supervisor?

20 A. I don't know.

21 However, there is a requirement, for people who
22 serve as a senior manager in Irico Group, this person
23 supposed to be a member of Chinese Communist Party member.

24 Okay. The reason I say your question is very
25 vague, is the fact that Mr. Guo joined Irico many, many

1 years ago, and even earlier than me. He started from
2 a technician at the factory, and become a deputy manager at
3 the glass factory, and then later on he was promoted to the
4 senior management. As a state-owned corporation, all the
5 senior managers supposed to be the member of the communist
6 party. This is an amendment by the SASAC, the State-owned
7 Assets Supervision Administration Commission of the State
8 Council.

9 MS. FU: I would like to make a correction to the
10 last sentence. "This is a requirement by the SASAC." Not
11 an amendment. It is a requirement.

INTERPRETER: Thank you.

13 BY MR. BENZ:

14 Q. Okay.

15 (Exhibit 8416 marked for identification)

16 Q. Mr. Wang, I've handed you the exhibit that's
17 been marked 8416. It was produced by Irizo in this
18 litigation with Bates numbers IRI-CRT-00001026 through 27.

19 We have the original Chinese document as well as
20 a certified English translation on top.

21 Please take as long as you would like to review
22 this document.

A. I have reviewed it.

24 0. What is this document?

A. This is an articles of association for Irico

3.25 billion yuan."

Do you see that?

A. Yes.

Q. As Irizo Display's corporate designee for topic 1, is that a correct description of Irizo display's main business goal for 2008 as it was written in 2007?

A. The question is not very clear.

MS. FU: I would like the interpreter to try that one more time.

MR. JACOBSSMEYER: I also object to the form of the question.

MR. BENZ: What is the basis for your objection?

MR. JACOBSMEYER: Mischaracterizes when the document was written.

A. Would you mind repeating your question.

BY MR. BENZ:

Q. Before I do, Mr. Wang, can you turn back to page 89.

Do you see on that page the date, April 23rd, 2008?

A. Yes, I saw it.

Q. And the signature shows this report was issued by Irico Display Component Co Ltd board of directors? Do you see that?

A. Yes.

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1 Q. This report appears to have been signed by
2 chairman of the board of directors Xing Daoqin, do you see
3 that?

4 A. Yes.

5 Q. Please turn back to page 19.

6 A. Yes. Go ahead.

7 Q. You see this sentence under business plan for
8 the new year:

9 "The company's main business goals for 2008:
10 Color tube sales of 15,380,000 and sales revenue of
11 3.25 billion yuan."

12 A. Yes, I saw it.

13 Q. As Irico Display's corporate designee for
14 topic 1, is that a correct description of Irico Display's
15 main business goals for 2008 as reported by the board of
16 directors on April 23, 2008?

17 A. (Chinese spoken) --

18 MS. FU: I would like the interpreter to try that
19 one more time. (Chinese spoken) --

20 INTERPRETER: (Chinese spoken).

21 A. (Chinese spoken) (Indicates).

22 MS. FU: Go ahead.

23 A. What has been written is how it is. Because
24 it is written as the business plan for the New Year 2008.

25 MR. BENZ: Thank you Mr. Wang, I'm going to turn

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1 Shenyang for a while, then I was transferred to Shenzhen for
2 a while before I was relocated back to Shenyang.

3 Q. That was not my question, Mr. Wang.

4 What I was trying to get at is what were your job
5 responsibilities. Not what your job history is.

6 A. When I started to join the company, I work as
7 a sales rep, and I do mainly do sales work. I remember
8 I also covered the territory in north east area of China.

9 There is a TV factory called Chiamu Shih --

10 INTERPRETER: C-H-I-A-M-U S-H-I-H.

11 A. So I was sales rep, and to sell the color
12 tubes. Then I was transferred to advertisement company.
13 That responsibility probably is not relevant to this
14 litigation case. Then I went to the Beijing office, or
15 branch office in Beijing. Also served as a sales rep. My
16 customer is Beijing TV factory, the brand name is called
17 Mudan.

18 Then I was relocated back to Shenyang. By that
19 time I went to Shenzhen, I work in one of the offices there,
20 and at that time Mr. Kao Wei was my colleague at Shenzhen.
21 At Shenzhen office my main responsibility is for TCL. And
22 cover some of the customers in Guangdong province. Later on
23 I took the responsibility as the director in the department,
24 then I kind of doing administrative or management work.
25 Also covers certain sales work. For a while I was also

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1 responsible for the sales of TCL. These are the background
2 that I can recollect.

3 So then I was transferred to the marketing, and
4 then supervised the entire sales team. Then for a while
5 I was not responsible for the sales issues. I kind of in
6 charge of the aftersales service. That's so much about it.

7 Q. Thank you, Mr. Guo (sic), you have given me
8 a lot to work with.

9 A. I try my best.

10 Q. I appreciate it, thank you.

11 A. (Chinese spoken).

12 Q. So you mentioned several specific customers
13 there. One of them was Chia -- I don't, I'm trying to read
14 off the -- the first customer was Chiamu Shih. The second
15 customer was Beijing TV factory Mudan, is that correct?

16 Did I state that accurately?

17 A. Yes, that's correct.

18 Q. And then when you moved to Shenzhen, you were
19 responsible for customer TCL, is that correct?

20 A. Yes, for a certain period. It is just for
21 a certain period.

22 Q. Do you remember generally what time period
23 that was?

24 A. I don't quite remember. In the beginning
25 I was in charge of TCL. By the time I was transferred to